



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*50 Main Street, Suite 1100  
White Plains, New York 10606*

February 14, 2025

**BY ECF**

The Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
Charles L. Briant Federal Building and Courthouse  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States v. Lin Feng*, 23 Cr. 286 (NSR)**

Dear Judge Román:

The Government respectfully submits this letter in response to the defendant, Li Feng's, renewed request for permission to travel to the People's Republic of China ("PRC") for three months. (D.E. 60.) Based on our consultation with the United States Probation Office ("Probation"), the Government opposes the request to the extent it would involve overseas travel for more than three weeks, but does not object to the extent it would involve overseas travel for three weeks or less.

On September 30, 2024, the defendant was convicted following a plea of guilty pursuant to a plea agreement to one count each of acting as an unregistered agent of a foreign power, namely, the PRC government, in violation of 18 U.S.C. § 951, and bribery, in violation of 18 U.S.C. § 201; and sentenced to a term of imprisonment of time served (approximately 16 months), three years' supervised release of three years, and a forfeiture money judgment in the amount of \$50,000, which is joint and several with co-defendant John Chen. The defendant is a Chinese citizen and had lawful permanent residence status at the time of his arrest.

As we have advised chambers and defense counsel, Feng's forfeiture obligation has been satisfied by a recently received forfeiture payment from his co-defendant. Because the defendants' obligation is joint and several, Chen's payment has the effect of also reducing Feng's obligation.


The Government understands that Probation opposes any travel for more than three weeks. It appears that Probation does not oppose travel for three weeks or less. Accordingly, we oppose

Feng's request to the extent it would involve overseas travel for more than three weeks, but do not object to the extent it would involve overseas travel for three weeks or less.

Respectfully submitted,

MATTHEW PODOLSKY  
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By:

  
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cc: Counsel of record (by ECF)